

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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| In re: | § | |
| | § | Chapter 11 |
| | § | |
| STEWARD HEALTH CARE SYSTEM | § | Case No. 24-90213 (CML) |
| LLC, <i>et al.</i> , | § | |
| | § | (Jointly Administered) |
| Debtors. ¹ | § | |
| | § | |
| | § | |

**NOTICE OF FILING OF STIPULATION BETWEEN THE DEBTORS
AND HSA ADJOURNING HEARING ON MEDICAID RECEIVABLES DISPUTE**

PLEASE TAKE NOTICE THAT:

1. On May 6, 2024, Steward Health Care System LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) commenced the above-captioned voluntary cases under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas.

2. On April 24, 2025, Healthcare Systems of America and its affiliates (“**HSA**”) filed the *Emergency Motion of Healthcare Systems of America to Enforce the Global Settlement Order and Compel the Debtors to Comply with Its Obligation Thereunder* (Docket No. 4718) (the “**Motion**”), requesting an emergency hearing for later that day. On April 26, 2025, HSA filed the *Notice of Hearing on Emergency Motion of Healthcare Systems of America to Enforce the Global Settlement Order and Compel the Debtors to Comply with Its Obligation Thereunder* (Docket No. 4733), which set the hearing on the Motion for May 1, 2025 at 1:00 p.m. (Central Time) (the “**Hearing**”).

3. At HSA’s request, the Debtors have agreed to adjourn the Hearing, subject to entry of a stipulation and agreed order by and between HSA and the Debtors on the terms set forth in the version attached as **Exhibit A** hereto (the “**Proposed Stipulation and Agreed Order**”).

4. The Proposed Stipulation and Agreed Order reflects the Debtors’ proposed version, and the Debtors understand that it remains subject to ongoing review by HSA.

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors’ service address for these chapter 11 cases is 2811 McKinney Avenue, Suite 300, Dallas, Texas 75204.

Dated: May 1, 2025
Houston, Texas

/s/ Clifford W. Carlson

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Certificate of Service

I hereby certify that on May 1, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Clifford W. Carlson

Clifford W. Carlson